

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JILLIAN BECK, Individually and
as Parent and Next Friend of
A.B., a Minor, and
ANDREW R. BECK, I, individually,

Plaintiffs,

vs.

Case No. 14-CV-00067 KG-WPL

ISAIAH BAKER, in his individual
Capacity, and JOSEPH CAMPA,
in his individual Capacity,

Defendants.

STIPULATION TO PROTECTIVE ORDER AND PROTECTIVE ORDER

COME NOW Defendants, Isaiah Baker and Joseph Campa, by and through the Office of the City Attorney (William R. Babington Jr., City Attorney, and Robert A. Cabello, Assistant City Attorney), and Plaintiffs, Jillian Beck, A.B., a minor, and Andrew R. Beck, I, by their counsel, Margaret Strickland, pursuant to FED. R. CIV. P. 26(c), stipulate that a Protective Order should issue:

1. This Protective Order shall apply to documents produced by Defendants' witness, Sergeant Shane Brisco, to Plaintiffs in response a subpoena duces tecum issued on September 30, 2014. The information provided by Sergeant Shane Brisco are Professional Standards Unit (PSU) investigation reports and use of force reports for Officer Manuel Chavez.

2. All such documents and materials produced by Defendants to counsel for Plaintiffs shall be used in the course of the above-captioned proceedings.

3. The documents and materials produced by Defendants to counsel for Plaintiffs shall not be published, orally, by copy, or by any other means, to any person other than the Plaintiffs or Plaintiffs' counsel, or to any person other than experts, employees of experts, or consultants involved in this matter.


4. Upon conclusion of this action including any appeals, counsel for Plaintiffs shall return to counsel for Defendants all copies of the documents and materials produced in response to this protective order. Defendants will retain all documents and materials returned by Plaintiffs for a period to ten years after the closing of Defendants' litigation file per State Documents Retention regulations

5. By approval of this Protective Order, counsel for Plaintiffs agrees to be bound by the conditions of this Protective Order.

6. Execution of this Protective Order does not constitute a waiver of any objection raised by Defendants to the production of any documents or information even if such documents or information are encompassed within this Protective Order.

7. Nothing in this motion/order prevents the Plaintiffs from seeking the Court's permission to introduce or use any disclosed materials.

DATED this 9th day of February, 2015.



UNITED STATES DISTRICT JUDGE

Respectfully submitted and stipulated to,

CITY OF LAS CRUCES

By: /s/Robert A. Cabello
William R. Babington Jr.
City Attorney
Robert A. Cabello
Assistant City Attorney
P.O. Box 20000
Las Cruces, NM 88004
(575) 541-2128
(575) 541-2017 Fax
Attorney for Defendants

and

Approved as to Form and stipulated to:

McGraw & Strickland, LLC.

By: Approved telephonically December 2014
Margaret Strickland
165 W. Lucero Avenue
P.O. Box 1239
Las Cruces, NM 88005
575-323-1529
Attorney for Plaintiffs